

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**UNOPPOSED JOINT MOTION TO AMEND THE EXPERT
DISCOVERY DEADLINE**

Plaintiff Netlist, Inc. (“Netlist”) and Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC respectfully requests that the Court amend the Third Amended Docket Control Order (Dkt. No. 205) to extend the deadline to complete expert discovery from January 9 to February 16. Netlist and Micron’s requested extension would not require any amendment to the remaining schedule. Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor Inc. do not oppose the requested extension. A proposed order is attached.

Current Deadline	Amended Deadline	Event
January 9, 2024	February 16, 2024	Deadline to Complete Expert Discovery

Because this extension does not impact any other dates in the schedule, the parties understand that a showing of good cause is not required. However, good cause for the extension exists to accommodate the scheduling conflicts of Netlist's and Micron's counsel and experts in view of at least the significant overlap with the proceedings in *Netlist, Inc. v. Micron Technology, Inc., et al.*, No. 2:22-cv-203-JRG (E.D. Tex.), the IPR proceedings between the parties, as well as another matter on which Netlist's lead counsel is also servicing as lead counsel (*G+ Communciations, LLC v. Samsung Electronics Co. LTD.*, Civ. Action No. 2:22-CV-00078-JRG), which is set to go to trial in this Court on January 22, 2024. Currently, the parties have agreed that Samsung will depose Dr. Groehn on January 8, Samsung and Micron will depose Mr. Gillingham on January 11, and Samsung will depose Mr. Kennedy and Dr. Mangione-Smith on January 12. The parties will work diligently to find mutually-agreeable dates prior to February 16, 2024 for the remaining witnesses.

Dated: January 7, 2024

Respectfully submitted,

/s/ Jason G. Sheasby

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LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on January 7, 2024, a copy of the foregoing was served to all counsel of record.

/s/ Yanan Zhao
Yanan Zhao

CERTIFICATE OF CONFERENCE

I hereby certify that the parties met and conferred on the subject matter of this

Motion to Amend the Docket Control Order, and all the parties agree to join the motion.

/s/ Yanan Zhao
Yanan Zhao